

27 May 2003

Bill Pennington Project Manager Energy Efficiency and Demand Analysis Division California Energy Commission 1516 Ninth Street, MS-28 Sacramento, CA 95814

sent via email: bpenning@energy.state.ca.us

re: Comments on February draft, Title 24 revision, Section 143 (a)(1)(C)

Dear Mr. Pennington:

Comment

"Continuous layer of rigid insulation" is nowhere defined. Does this require a monolythic system of sprayed polyurethane foam or similar products? Does it include / permit a conventional system of rigid insulation boards or panels, installed according to the manufacturer's directions and related code requirements?

If you have any questions, please call me at (323) 908-5279.

Paul A. Beemer Director, Legal & Technical Affairs Henry Company